

fluid flows through the connected pack sections. As explained in the specification, joiner caps are open-end caps for connecting pack sections together allowing fluid to flow therethrough, i.e., fluid flows through the open-end cap into the adjacent filter pack. In contrast, the filter cartridges of Rosaen are not configured to allow fluid flow therethrough. The filter cartridges of Rosaen include blind end caps that do not allow fluid to flow through the end cap into the adjacent filter cartridge. In the filter device of Rosaen, fluid is directed to flow from cartridge filter 22 to the fluid outlet 16, without passing through adjacent filter cartridge 24 (*see e.g.*, col. 3, line 58 to col. 4, line 7). Indeed, Rosaen explicitly teaches sealing means 34 on the front end cap 30 of adjacent cartridge filter 24 that prevents fluid communication between the annular chamber 54 (which communicates with cartridge filter 22) and the filter element 28 of adjacent cartridge filter 24. Rosaen is clearly directed to a filter device utilizing a single cartridge filter for filtration and does not even suggest two or more pack sections and joiner caps connected to form a hollow separation arrangement.

Furthermore, Rosaen does not disclose or suggest any element lengths, let alone two or more pack sections connected to form a hollow separation arrangement being at least about 40 inches in length and having an interior diameter of at least about 2 inches. According to the Office Action, the filter device of Rosaen, "could be at least about 40 inches in length, depending on the number of pack sections joined together or the length of individual pack sections being joined together and may also have an interior diameter of at least about 2 inches depending upon the size of the housing and its inner diameter". However, according to the MPEP §2143.01, "the mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination." As explained above, Rosaen does not disclose any element lengths or diameters and does not even remotely suggest the desirability of a hollow separation arrangement having a length of at least about 40 inches in combination with an interior diameter of at least about 2 inches. Accordingly, merely asserting the filter device of Rosaen could be at least about 40 inches and may have an interior diameter of at least about 2 inches, without any objective teaching in the prior art suggesting such a combination of length and diameter does not render claim 1 obvious.

The secondary references do not cure the deficiencies of Rosaen. For example, neither Stoyell nor Pall discloses two or more pack sections and joiner caps connected together to form a hollow separation arrangement or a hollow separation arrangement having a length of at least about 40 inches in combination with an interior diameter of at least about 2 inches.

In re Appln. of Connors et al.
Application No. 09/091,508

Accordingly, since the cited references fail to disclose all the elements of independent claim 1, *prima facie* obviousness of this claim and the claims depending from this claim has not been established.

In view of the remarks recited herein, the application is considered in good and proper form for allowance, and the Examiner is respectfully requested to pass this application to issue.

Should there remain any issues outstanding, the Examiner is invited to call the undersigned at her Washington, D.C. office.

Respectfully submitted,

LEYDIG, VOIT & MAYER, LTD.



Shannon D. Schemel
Registration No. 47,926

Suite 300
700 Thirteenth Street, NW
Washington, D.C. 20005
Telephone: (202) 737-6770
Facsimile: (202) 737-6776
Date: February 2, 2002
SDS